

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

HARRY DONAS;
VIKTOR BERLYAVSKY;
MIKE CASSAR;
RETHA DAVIS;
NICHOLAS GIACIA;
MICHAEL GOLDEN;
MATTHEW H. GOLDSMITH, ESQ.;
KEVIN GOYETTE;
STACEY MORIATES;
FRITZNER REMY;
PIERRE ST. LOUIS;
SUSAN THOMAS,
on behalf of Aron Thomas (deceased);
ANONYMOUS;

Plaintiffs,

-against-

Group A

CITY OF NEW YORK;
BILL DEBLASIO, *Mayor*;
MICHAEL R. BLOOMBERG;

Group B1

NEW YORK CITY DEPARTMENT OF
ENVIRONMENTAL PROTECTION
VINCENT SAPIENZA, *Commissioner*;
CASWELL HOLLOWAY IV;
STEVEN W. LAWITTS;
EMILY LLOYD;
CARTER H. STRICKLAND JR.;
CHRISTOPHER O. WARD;

Group B2

GREGORY ANDERSON;
BOB AVILTRONI;
HENRY BARANCZAK;
JAMES CAGGIANO;
ZOE ANN CAMPBELL;
DAVID M. COHEN;
EDWARD COLEMAN;
GREGG C. COSTA;
ANGELA DELILLO;

Case No.: 2017-cv-06520 [CM]

NOTICE OF LIS PENDENS

Jury Trial Demanded

DENISE DYCE;)
PAMELA ELARDO;)
MICHAEL FARNAN;)
AARON FEINSTEIN;)
KATHRYN GARCIA;)
ARISTEDES GEORGELIS;)
MICHAEL GILSENAN;)
CHARLENE GRAFF;)
ROBERT GROPPÉ;)
VILHELMINA GUTHRIE;)
VIRGINIA GZIKI;)
DIANE HAMMERMAN;)
JAMES HANRATTY;)
FAYE JACQUES;)
PATRICK JAGESSAR;)
NAUDET JOASIL;)
TINA JOHNSTONE;)
WILLIAM KELLY;)
PAUL KISKORNA;)
STEVE KOLLER;)
ROBIN LEVINE;)
WILLIAM LEWINSKY;)
ANGELA LICATA;)
ALFONZO LOPEZ;)
CARLA LOWENHEIM;)
PERSIS LUKE;)
ANTHONY MARACIC;)
RALPH MARCHITELLI;)
SHAY MCATAMNEY;)
GEROULD MCCOY;)
MICHAEL MCGREGOR;)
ROBERT MCHALE;)
MATHILDE MCLEAN;)
CECIL MCMASTER;)
OSCAR MEDINA;)
NICHOLAS MINUNNI;)
KENNETH MORIARTY;)
JAMES MUELLER;)
DAVID OLTON;)
ROBERT ORTIZ;)
MARTHA OSSENI;)
ELIO PARADIS;)
DANIEL PASTORE;)
PRAVIN PATEL;)
TRIKAM PATEL;)
JOHN PETITO;)
DIANA RITTER;)

JAMES ROBERTS;)
 HERBERT ROTH;)
 JOHN ROUSAKIS;)
 PAUL RUSH;)
 DEBORAH SINGER;)
 PAUL SMITH;)
 VIRGINIA SMYTH;)
 BRIAN SWARTHOUT;)
 EDWARD TIMBERS;)
 CARL TOTH;)
 ROY TYSVAER;)
 JORGE VILLACIS;)
 JERRY VOLGENDE;)
 PETER WILLIAMSEN;)
 WILLIAM YULINSKY;)

Group C

MEMBERS & ASSOCIATES OF THE PROFACI/)
 COLOMBO, LUCIANO/GENOVESE AND)
 OTHER NEW YORK CITY ORGANIZED)
 CRIME FAMILIES OF THE ITALIAN)
 AMERICAN MAFIA;)
 ANTHONY SCOTTO JR.;)

Group D

DISTRICT COUNCIL 37;)
 THOMAS CUSTANCE;)
 JOHN ENGLISH;)
 HENRY GARRIDO;)
 WALTHENE PRIMUS;)
 EDDIE RODRIGUEZ;)
 PETER STEIN;)
 STEVEN SYKES;)
 JAMES TUCCIARELLI;)
 MAF MISBAH UDDIN;)

Group E1

ALGIN MANAGEMENT CO. LLC;)
 ALISON L. ANDREWS;)
 ALLURE GROUP OF NEW YORK INC.;)
 ARCADIS NORTH AMERICA/USA INC.;)
 BERLINROSEN LTD.;)
 THE BLACKSTONE GROUP LP;)
 CASTLE OIL CORP.;)
 JOHN CATSIMATIDIS;)
 DDG PARTNERS LLC;)
 JONATHAN GRAY;)

BILL HYERS;)
KUSHNER COMPANIES LLC;)
JARED C. KUSHNER;)
JOEL LANDAU;)
DAVID LICHTENSTEIN;)
THE LIGHTSTONE GROUP;)
JOE MCMILLAN;)
RUSS OFFINGER;)
BRUCE RATNER;)
JONA RECHNITZ;)
JEREMY REICHBERG;)
JESSE C. ROSE;)
JONATHAN ROSEN;)
SIBRIZZI FUEL OIL ENTERPRISE INC.;)
LEONARD SIBRIZZI;)
SLATE PROPERTY GROUP LLC;)
SL GREEN REALTY GROUP;)
TOLL BROTHERS INC.;)
TWO TREES MANAGEMENT CO. LLC.;)
VEOLIA NORTH AMERICA;)
JED WALENTAS;)
JOHANNES W. WEBER;)
EMMA WOLFE;)
)
<u>Group E2</u>)
ALGIN MANAGEMENT CO. LLC;)
ALISON L. ANDREWS;)
ALLURE GROUP OF NEW YORK INC.;)
ARCADIS NORTH AMERICA/USA INC.;)
BERLINROSEN LTD.;)
THE BLACKSTONE GROUP LP;)
CASTLE OIL CORP.;)
JOHN CATSIMATIDIS;)
DDG PARTNERS LLC;)
JONATHAN GRAY;)
BILL HYERS;)
KUSHNER COMPANIES LLC;)
JARED C. KUSHNER;)
JOEL LANDAU;)
DAVID LICHTENSTEIN;)
THE LIGHTSTONE GROUP;)
JOE MCMILLAN;)
RUSS OFFINGER;)
BRUCE RATNER;)
JONA RECHNITZ;)
JEREMY REICHBERG;)
JESSE C. ROSE;)

JONATHAN ROSEN;)
SIBRIZZI FUEL OIL ENTERPRISE INC.;)
LEONARD SIBRIZZI;)
SLATE PROPERTY GROUP LLC;)
SL GREEN REALTY GROUP;)
TOLL BROTHERS INC.;)
TWO TREES MANAGEMENT CO. LLC.;)
VEOLIA NORTH AMERICA;)
JED WALENTAS;)
JOHANNES W. WEBER;)
EMMA WOLFE;)
)
<u>Group F</u>)
MAYRA BELL;)
ERIC EICHENHOLTZ;)
JUDITH A. ENCK;)
PAUL L. HERZFELD;)
JOHN KANTOR;)
HON. LAWRENCE S. KNIPEL;)
HON. HOWARD G. LANE;)
MARK LEVINE;)
LT. RICHARD MANTELLINO;)
SGT. JORDAN S. MAZUR;)
DET. ROBERT J. PETERS;)
YDANIS RODRIGUEZ;)
PAUL VALLONE;)
PETER F. VALLONE, JR.;)
PETER VALLONE SR.;)
)
<u>Group G</u>)
UNKNOWN PERSONS, PARTNERSHIPS,)
JOINT VENTURES, CORPORATIONS)
AND GOVERNMENTAL AGENTS;)
)
<i>Defendants.</i>)
_____)

NOTICE IS HEREBY GIVEN that an action has been commenced in the United States District Court for the Southern District of New York before Chief Judge Colleen McMahon, pursuant to, *inter alia*, the Racketeer Influenced and Corrupt Organizations Act of 1970, *et. seq.* 18 U.S.C. §§ 1961-1968 (RICO Act), and where judgment demanded against the *Defendants* would affect title, possession, use, and/or enjoyment of real property as more fully described *infra*.

The objects of this special prosecution are monetary damages and equitable relief to enjoin an ongoing criminal enterprise responsible for embezzling multiple billions of dollars from certain benefit funds associated with District-Council 37, A.F.S.C.M.E., AFL-CIO, and the operating budget of the New York City Department of Environmental Protection agency, both of which are misappropriated, *in part*, via a real estate market development/re-development scheme designed and currently led by members & associates from the five New York City organized crime families of the Italian American Mafia, and executed by colluding New York City government officials, DC-37 labor union executives & members, private land developers, independent contractors, and other government agents by exploiting municipal personnel, confidential environmental reports, and other public resources to artificially inflate real property market values and thus enable money laundering opportunities of the embezzled funds, which are circulated through a network of defendant aliases and limited liability shell companies, and all of which total in excess of \$1.95 billion dollars.

NOTICE IS FURTHER GIVEN to the Clerks for **Bronx, New York, Queens and Kings** Counties that this *Notice of Lis Pendens* shall be immediately recorded and indexed against the BLOCK-LOTS described and ADDRESSES designated in the spreadsheets annexed hereto as ***Exhibits A, B, C & D***, respectively.

WHEREFORE, throughout the pendency of this action, any person whose conveyance or incumbrance against a *block-lot* in which affected property is situated and recorded from the date of this filing shall be bound by all proceedings to the same extent as any party so named.

DATED: New York, New York
September 21, 2017

Respectfully Submitted,

A handwritten signature in blue ink, consisting of several loops and a long horizontal stroke extending to the right.

MATTHEW H. GOLDSMITH, ESQ. (MG-0710)
R. HAROLD SINGER, ESQ.
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Special District Prosecuting Attorneys
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